SARAH POTTER, (CA SBN 280478) 1 LAW OFFICE OF SARAH POTTER 2 214 Duboce Avenue San Francisco, CA 94103 t. (415) 423-3447 3 sarah@sarahpotterlaw.com 4 Attorney for Defendant GOONAN 5 IN THE UNITED STATES DISTRICT COURT 6 FOR THE NORTHERN DISTRICT OF CALIFORNIA 7 OAKLAND DIVISION 8 9 UNITED STATES OF AMERICA, Case No.: 4:24-cr-00414 JSW 10 Plaintiff, STIPULATION AND [PROPOSED] ORDER 11 vs. CONTINUING SENTENCING HEARING 12 CASEY ROBERT GOONAN, Defendant 13 14 The defendant, by and through his counsel, Sarah Potter, and the United States, by and 15 through its counsel, Assistant U.S. Attorney Nikhil Bhagat, hereby move the Court to continue 16 the date of the defendant's sentencing hearing until June 10, 2025 at 1:00 p.m. The probation 17 officer, Pepper Friesen, has requested additional time to complete the presentence report due to 18 the defendant's unavailability to be interviewed because he was placed in medical isolation as a 19 result of an infection. In addition, the defendant requires additional time to receive necessary 20 medical and psychiatric records that have been requested. As the defendant has pled guilty there 21 are no Speedy Trial Act concerns implicated by this continuance. The probation officer has 22 confirmed her availability on the requested date for sentencing. Accordingly, the parties hereby

ask the Court to continue the matter until June 10, 2025 at 1:00 p.m. for sentencing.

STIPULATION AND [PROPOSED] ORDER CONTINUING SENTENCING HEARING - 1

23

24

1	Dated: February 28, 2025	/s/
2	$\overline{S}$ .	ARAH POTTER
3	A	ttorney for Defendant Goonan
4	11	ATRICK D. ROBBINS
5	A	cting United States Attorney
6	_	/s/
7		IKHIL BHAGAT ssistant United States Attorney
8		
9		
10		
11		
12		
13		
14		
15		
16		
17		
18		
19		
20		
21		
22		
23		
24	STIPULATION AND [PROPOSED] ORDER CONTINUING SENTENCING HEARING - 2	

1	[PROPOSED] ORDER	
2	Good cause having been shown and by Stipulation of the parties herein,	
3	IT IS HEREBY ORDERED that defendant Casey Goonan's sentencing hearing be	
4	continued to June 10, 2025 at 1:00 p.m.	
5	PURSUANT TO STIPULATION, IT IS SO ORDERED.	
6		
7	Dated:	
8	HON. JEFFREY S. WHITE United States District Court	
9		
10		
11		
12		
13		
14		
15		
16		
17		
18		
19		
20		
21		
22		
23		
24	STIPULATION AND [PROPOSED] ORDER CONTINUING SENTENCING HEARING - 3	